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BY ECF

Hon. Dora L. Irizarry  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States v. Dominick Dionisio  
04 Cr 1068 (DLI)

Dear Judge Irizarry:

In January of 2008, Mr. Dionisio was released on a \$2 million Appearance Bond in the case, secured by the premises by two pieces of real property owned by his sister and her husband, Antoinette and Philip D'Agostino. The two properties had a little over \$1 million in equity in the aggregate.

By this letter, I am respectfully requesting that Mr. Dionisio's Bond be modified as follows. Namely, that the D'Agostino's be removed as suretors under the Bond and replaced by three other suretors and two other pieces of real property. The reason for this request is that the D'Agostino's eldest daughter is in law school and they are unable to obtain financing for her education with a \$2 million judgment against them.

Two of the proposed new suretors are Maryann and Vincent Locasio. Their residence is located at 86 Garretson Avenue in Staten Island, and has \$375,000 in equity (a fair market value of \$750,000 and existing mortgage of \$375,000). The other suretor is Gino Vitale, whose residence is located at 217 Conover Street in Staten Island. Mr. Vitale's residence has about \$550,000 in equity (a fair market value of \$900,000 and an existing mortgage of \$350,000) .

All other terms of the Bond, as they presently exist, shall remain the same.

The government has consented to this request.

Respectfully submitted,

/JRF/

James R. Froccaro, Jr.

JRF:tp